UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

ANITA BERMUDEZ,

07-CV-01470 (AKH)

Plaintiff,

-against-

et al.

VERIZON NEW YORK INC.,

Defendants.

NOTICE OF DEFENDANT VERIZON NEW YORK INC.'S ADOPTION OF ANSWER TO MASTER COMPLAINT

PLEASE TAKE NOTICE THAT Defendant Verizon New York Inc. ("Verizon") hereby adopts as its Answer in the instant case its Answer to Plaintiffs' Master Complaint which was filed and served on October 16, 2007 in the matter of In re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). In accordance with Case Management Order No. 4, the allegations of the instant Check-Off Complaint are deemed to be denied. Verizon also incorporates by reference all averments and denials of its Answer to Plaintiffs' Master Complaint as though same were more fully set forth herein at length. Verizon further adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Verizon reserves the right to file and serve an amended answer and specifically reserves the right to interpose cross-claims and third-party claims.

WHEREFORE, Verizon demands judgment dismissing the above-captioned action as against Verizon, together with its cost and disbursements.

Dated: November 26, 2007 /s/ Eric F. Leon

Eric F. Leon Lee Ann Stevenson Andrew Dunlap Michael D. Reisman KIRKLAND & ELLIS LLP

Citigroup Center 153 East 53rd Street

New York, New York 10022-4611 Telephone: (212) 446-4800 Facsimile: (212) 446-4900

Attorneys for Defendant Verizon New York Inc.

TO: Christopher LoPalo, Esq.

WORBY GRONER EDELMAN & NAPOLI BERN, LLP

115 Broadway, 12th Floor New York, New York 10006

Robert A. Grochow, Esq. ROBERT A. GROCHOW, P.C. 233 Broadway, 5th Floor New York, New York 10279

Gregory J. Cannata, Esq. LAW OFFICES OF GREGORY J. CANNATA 233 Broadway, 5th Floor New York, New York 10279

## **Liaison Counsel for Plaintiffs**

Marc D. Weinblatt, Esq. SANDERS, SANDERS, BLOCK, WOYICK, VIENER & GROSSMAN, P.C. 100 Herricks Road Mineola, New York 11501

David Kremen, Esq.
OSHMAN & MIRISOLA, LLP
42 Broadway, 10th Floor
New York, NY 10004

All Defense Counsel (via ECF)